

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CASE NO. 1:17-cv-12486-DJC

RAOUL MARRADI,	)
	)
Plaintiff	)
	)
v.	)
	)
LUCAS SMB ENTERPRISE, INC.	)
and JOSHUA PLAHM	)
	)

**RULE 68 OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure Defendants, Lucas SMB Enterprise, Inc. and Joshua A. Plahm, hereby submit an offer to allow judgment with the costs now accrued.

Defendants offer that judgment may enter that:

1. To the extent that it is readily achievable to do so, Defendants shall bring into compliance any element of the premises at 44 Batterymarch Street, Boston Massachusetts leased to Lucas Enterprise SMB, Inc. that is shown by an independent architect to be in violation of the ADA or ADAAG.
2. Defendants will pay the reasonable attorney's fees, as determined by the Court, incurred by plaintiff accrued as of the date of this offer.

Respectfully submitted,

Defendants,  
By their attorneys,

/S/

David L. Klebanoff  
BBO # 274550  
Joshua Klebanoff  
BBO# 685886  
Gilman, McLaughlin & Hanrahan LLP  
101 Merrimac Street  
P.O. Box 9601  
Boston, MA 02114-9601  
617-227-9999  
[dklebanoff@gilmac.com](mailto:dklebanoff@gilmac.com)  
[jklebanoff@gilmac.com](mailto:jklebanoff@gilmac.com)

Dated: March 9, 2018

### CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of  
the above document was served upon the attorney  
of record for each party by ~~mail/hand~~ EDC system

Date 3.9.18

